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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

GURJIT S. DOAD and SARABJIT DOAD,
husband and wife and their marital
community,

Case No. 3:21-cv-00645-JR

Plaintiffs,

v.

C.R. ENGLAND, INC., a foreign corporation;
LEROY TILLMAN, JR. and JANE DOE
TILLMAN, husband and wife and their
marital community' and DOES 1-X,

**DEFENDANTS' OBJECTIONS TO
PLAINTIFFS' EXHIBIT LIST AND
WITNESS LIST**

Defendants.

Defendants C.R. England, Inc. and Leroy Tillman, Jr. (collectively, "Defendants") respectfully submit the following objections to Plaintiffs' Exhibit List and Witness List. Defendants reserve the right to object to individual exhibits, witnesses, and testimony as appropriate during the trial as evidence is presented.

**Page 1 - DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST AND
WITNESS LIST**

OBJECTIONS TO EXHIBITS

Plaintiffs' Exhibit No.	Description	Objection
1.	Medical records of Abbotsford Regional Hospital	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
2.	Medical records of Access MRI	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
3.	Medical records of Mark Adrian, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
4.	Medical records of Dean Burrill, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
5.	Medical records of CBI Health Centre	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
6.	Medical records of Cambie Surgery Centre	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
7.	Medical records of Charles Fisher, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
8.	Medical records of Navraj Reran, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
9.	Medical records of Jonathan Hiebert, DC	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
10.	Medical records of Harajit Lail, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
11.	Medical records of Simpson Leung, DC	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>

Plaintiffs' Exhibit No.	Description	Objection
12.	Medical records of Mark Matishak, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
13.	Medical records of Raphaelle Charest Morin, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
14.	Medical records of Mt. Lehman Physiotherapy	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
15.	Medical records of Mohammad Nagaria, MD	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
16.	Medical records of Surrey Memorial Hospital	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
17.	CD - Abbotsford Regional Hospital imaging	<i>Likely no objection, but any additional objections (including foundation) expressly reserved</i>
18.	CD - Access MRI imaging	<i>Likely no objection, but any additional objections (including foundation) expressly reserved</i>
19.	CD - Surrey Memorial Hospital imaging	<i>Likely no objection, but any additional objections (including foundation) expressly reserved</i>
20.	Vocational Rehabilitation records	FRE 403; 801-02; MIL 10; <i>additional objections (including foundation) expressly reserved</i>
21.	Disability Documents	FRE 403; 801-02; MIL 1, 10; <i>additional objections (including foundation) expressly reserved</i>
22.	Plaintiff's Corporation Income Tax Return	FRE 401; MIL 1; <i>additional objections expressly reserved</i>
23.	WorkSafe BC Health Care and MSP Payment Details dated October 19, 2022	FRE 403; 801-03; MIL 1, 12, 13; <i>additional objections expressly reserved</i>

Page 3 - DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST AND WITNESS LIST

Plaintiffs' Exhibit No.	Description	Objection
24.	WorkSafe BC Vocational Rehabilitation Payment Detail dated October 19, 2022	FRE 403; 801-03; MIL 1, 12, 13; <i>additional objections expressly reserved</i>
25.	Plaintiff Gurjit Doad's Driver's Daily Log dated May 20, 2019	None at this time; <i>additional objections expressly reserved</i>
26.	Defendant Leroy Tillman's Driver's Daily Log dated May 20, 2019	FRE 401-03; <i>additional objections expressly reserved</i>
27.	Defendant's Bill of Lading	FRE 401-03; <i>additional objections expressly reserved</i>
28.	Defendant's TripPak Envelope	FRE 401-03; <i>additional objections expressly reserved</i>
29.	Defendant's Registration for 2019 Freightliner Tractor	FRE 401-03; <i>additional objections expressly reserved</i>
30.	Defendant's Registration for 2018 Trailer	FRE 401-03; <i>additional objections expressly reserved</i>
31.	Google Earth Truck Stop Photos	<i>Likely no objection, but any additional objections expressly reserved</i>
32.	Photo of Vehicle Impact	<i>Likely no objection, but any additional objections expressly reserved</i>
33.	Photo of Defendant's Trailer	<i>Likely no objection, but any additional objections expressly reserved</i>
34.	Photo of Ladder in Plaintiff's Truck (Illustrative)	<i>Likely no objection, but any additional objections expressly reserved</i>
35.	Photo of Ladder and Driver's Seat in Plaintiffs Truck (Illustrative)	<i>Likely no objection, but any additional objections expressly reserved</i>
36.	AMA Guide to Evaluation of Disease Injury Causation	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
37.	Annular Tears (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
38.	Anatomy Review Article Re Annular Tears	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>

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Plaintiffs' Exhibit No.	Description	Objection
39.	Pearls Biomechanical Trauma - Lumbar Disc Herniation Article	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
40.	Treatment of Lumbar Disc Herniation Article	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
41.	New England Journal of Medicine Article Re Back Pain - Frymoyer	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
42.	Delayed Injuries AICA Orthopedics Article	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
43.	Orthopedic Clinics Article Re Lumbar and Cervical Spine Protrusion/Extrusion	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
44.	Chemical Substances of Disc Pain (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
45.	Dermatomes (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
46.	Health Services Research Article Re Disability Compensation	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
47.	Disc Pain Neurochemicals (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
48.	Spine Article by Carragee Re Does Minor Trauma Cause Serious Low Back Illness	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
49.	Asian Spine Journal Article Re Neuropathic Pain/Failed Back	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
50.	Radiopaedia Re Failed Back	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>

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Plaintiffs' Exhibit No.	Description	Objection
51.	Article by Millard/An Re Herniated Disc	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
52.	ICD 10 Codes for Traumatic Intervertebral Herniation	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
53.	Mayo Clinic Website Re Disk Herniation	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
54.	Neurological Research Article Re MR Evaluation of Epidural Fibrosis	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
55.	Radiology Article Re Disk Extrusion and Neural Compression	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
56.	StatPearls Article Re Neuroanatomy, Reticular Activation System	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
57.	RadioGraphics Article Re Origin Back Pain	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
58.	Mayo Clinic Article Re Disk Herniation and Pain Delay	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
59.	Article Re Scar Tissue and Pain After Back Surgery	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
60.	Spine Journal Article Re Lumbar Disc Nomenclature	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
61.	Journal of Manipulative and Physiological Therapeutics Article Re Symptoms of Protruded Disc	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
62.	Spine Universe Article Re Types of Disc Pathology	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>

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Plaintiffs' Exhibit No.	Description	Objection
63.	American Journal of Neuroradiology Re Annular Tear and Disc Degeneration	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
64.	Journal of Orthopaedics Surgery Article Re Radiology Disc Protrusion	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
65.	Annals of Physical and Rehabilitation Medicine Article Re Modic 1 Changes	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
66.	Modic 1 (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
67.	Wikipedia Article Re Modic Changes	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
68.	Modic Changes (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
69.	Radiology Select Article Re Modic Discogram	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
70.	Intervertebral Disc (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
71.	Annular Tear Concentric (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
72.	Annular Tear Concentric Tear (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
73.	Annular Tear (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
74.	Annular Tear (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>

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Plaintiffs' Exhibit No.	Description	Objection
75.	Article Re Annular Tear Symptoms	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
76.	Bulges (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
77.	Disc Areas of Injury (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
78.	Herniated Nucleus Pulposus (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
79.	Herniated Nucleus Pulposus Tear (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
80.	Microdiscectomy (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
81.	Normal Disc (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
82.	Protrusion/Extrusion Images (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
83.	Root Traversing (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
84.	Spinal Stenosis (Illustrative)	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
85.	International Journal of Neuroscience Article Re Carpal Tunnel and Cytokines	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
86.	American Journal of Radiology Article Re Carpal Tunnel and MRI	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>

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Plaintiffs' Exhibit No.	Description	Objection
87.	Mayo Clinic Article Re Carpal Tunnel Syndrome	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
88.	Journal of Electromyography and Kinesiology Article Re Carpal Tunnel	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
89.	American Journal of Neuroradiology Article Re Annular Tears	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
90.	North American Spine Society Guidelines for Spine Care	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
91.	European Radiology Article Re Positional Change in Lumbar- Disc Herniation with MR	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
92.	Musculoskeletal Diseases, Spine Trauma Book, pages 215-236	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>
93.	International Society Study of the Lumbar Spine, Section 17, Chapter 7: Posttraumatic Changes of the Intervertebral Disc	FRE 401-03; 801-02; MIL 10; <i>additional objections expressly reserved</i>

OBJECTIONS TO WITNESSES

Witness Name	Objection
Gurjit Doad	Likely no objections outside of any potential issues raised in Motions <i>in Limine</i> . <i>Additional objections reserved until such time as witness is examined testimony is provided.</i>
Sarabjit Doad	Likely no objections outside of any potential issues raised in Motions <i>in Limine</i> . <i>Additional objections reserved until such time as witness is examined testimony is provided.</i>
David Doad	FRE 403; Potential issues raised in Motions <i>in Limine</i> ; <i>additional objections reserved until witness is examined and testimony is provided.</i>

Witness Name	Objection
Harmeet Doad	FRE 403; Potential issues raised in Motions <i>in Limine</i> ; <i>additional objections reserved until witness is examined and testimony is provided.</i>
Marty Ellison	Likely no objections.
Leroy Tillman, Jr.	Likely no objections outside of any potential issues raised in Motions <i>in Limine</i> . <i>Additional objections reserved until such time as witness is examined testimony is provided.</i>
Robert Malaer, MSN, RN	FRE 402-03; 702; 801-03; All issues raised in Defendants' Motions <i>in Limine</i> , including MILs 1, 2, 3, 6, 10, 13 and 14
Paul Pakulak, OT	FRE 402-03; 702; 801-03; All issues raised in Defendants' Motions <i>in Limine</i> , including MILs 1, 6, 10, 13 and 14
Navraj S. Heran, MD	FRE 402-03; 702; 801-03; All issues raised in Defendants' Motions <i>in Limine</i> , including MILs 1, 6, 10, 13 and 14
Alan N. Schwartz, MD	FRE 402-03; 702; 801-03; All issues raised in Defendants' Motions <i>in Limine</i> , including MILs 1, 6, 10, 13 and 14
Harajit Lail, MD	FRE 402-03; 702; 801-03; All issues raised in Defendants' Motions <i>in Limine</i> , including MILs 1, 6, 10, 13 and 14
Eric Knowles, MBA	FRCP 26; 37; FRE 402-03; 702; 801-03; All issues raised in Defendants' Motions <i>in Limine</i> , including MILs 1, 4, 5, 6, 10, 13 and 14

DATED this 31st day of October, 2022.

SUSSMAN SHANK LLP

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